



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Recycling Connections, Henderson, CO

**FROM:** Laura Steel, Environmental Engineer  
AECAB (MI/WI)

**THRU:** Sarah Marshall, Section Supervisor  
AECAB (MI/WI)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Recycling Connections

**Facility Location:** 9985 E 104th Ave., Unit A, Henderson, CO 80640

**Date of Inspection:** June 23, 2022

**EPA Inspector(s):**

1. Laura Steel, Environmental Engineer
2. Natalie Schulz, Environmental Engineer

**Other Attendees:**

1. Dominic Brienza, Vice President

**Contact Email Address:** dominic@rciscrapmetal.com

**Purpose of Inspection:** To assess the facility's compliance with the Clean Air Act and its current air permit.

**Facility Type:** Scrapyard

**Regulations Central to Inspection:** Clean Air Act, Part 82 – Protection of Stratospheric Ozone, Subpart F – Recycling and Emissions Reduction at 40 C.F.R. §§ 82.150-82.169

**Arrival Time:** 8:10 AM (MT)

**Departure Time:** 9:00 AM (MT)

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet – via email
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Dominic Brienza unless otherwise noted.

**Process Description:**

Recycling Connections accepts white goods and appliances, refrigeration components as sealed units (compressors, condensers), A/C radiators, and vehicle shells (no fluids). This has been their standard practice for the last 5 years, at minimum. They do not perform on-site refrigerant recovery and reject appliances potentially containing refrigerant that are fully intact. Recycling Connections primarily receives scrap from peddlers; Recycling Connections does not have contracts with any industrial suppliers (99% of sheet iron was estimated to come from peddlers). All customers are required to sign a scale ticket after payment verifying that the scrap they sold does not contain hazardous material. The facility does not have a shredder but does have a baler on-site.

**Staff Interview:**

Recycling Connections is an electronic, ferrous, and non-ferrous recycling company with approximately 20 employees. They do not have a formalized material acceptance or rejection policy, and Brienza stated in a post-inspection follow-up email that Recycling Connections will not accept contaminated or hazardous material or material that is not approved by industry standards, and if material can't be recycled or traded within industry standards, it will be rejected at the scales. Recycling Connections informed EPA that they accept scrap that previously contained refrigerant if it had been emptied of all fluids, including appliances with cut or damaged lines and A/C radiators that had been drilled out. They accept approximately 1,300 tons of scrap per month of which 10% is appliances. Approximately 8% of the appliances they accept are refrigerators. They accept approximately 80,000 pounds per month of A/C radiators and 40,000 pounds per month of vehicle radiators. Recycling Connections does not require formalized contracts or signed statements certifying proper refrigerant recovery from commercial clients or peddlers.

**TOUR INFORMATION**

**EPA Tour of the Facility:** Yes

**Data Collected and Observations:**

No signage communicating the materials the facility accepts/does not accept was observed at the facility's scrap entrance. Inspectors observed the scrap pile; multiple refrigerators were seen in the pile. One of these refrigerators was observed to have cut refrigerant lines. Inspectors observed a scale ticket that Recycling Connections requires the customer to sign; there were no lines for documenting the name and address of the person who performed the refrigerant recovery. A copy of this ticket was requested in a post-inspection follow-up email.

**Photos and/or Videos:** were taken during the inspection.

**CLOSING CONFERENCE**

☒ Provided U.S. EPA point of contact to the facility

**Requested documents:**

- Records (or an estimate, if records are unavailable) that showcase the number of small appliances and refrigeration components (the type that use refrigerant, e.g. fridges, freezers, dehumidifiers, vending machines, compressors, condensers, radiators, etc., NOT stoves/washers/dryers/dishwashers) delivered to Recycling Connections in the last year (since July 2021)
- Example of a scale ticket (and any other documents that peddlers or commercial clients are required to fill out before their scrap is accepted) and the date range that scale tickets have been used at Recycling Connections
- Material acceptance policy
- Rejection policy, if different from the material acceptance policy
- Appliance rejection logs for the last 3 years (since June 2019)

**Concerns:** Recycling Connections accepts appliances with cut refrigerant lines and A/C units with drillholes for refrigerant draining, and they do not require vendors to present signed statements certifying proper refrigerant recovery before accepting scrap.

**DIGITAL SIGNATURES**

Report Author: \_\_\_\_\_

Section Supervisor: \_\_\_\_\_

**Facility Name:** Recycling Connections

**Facility Location:** 9985 E 104th Ave., Unit B, Henderson, CO 80640

**Date of Inspection:** June 23, 2022

**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name:</b> Natalie Schulz	<b>2. Archival Record Location:</b> <a href="https://usepa-my.sharepoint.com/:f:/r/personal/steel_laura_epa_gov/Documents/Recycling%20Connections/Recycling%20Connections%20Photos?csf=1&amp;web=1&amp;e=4tXGN2">https://usepa-my.sharepoint.com/:f:/r/personal/steel_laura_epa_gov/Documents/Recycling%20Connections/Recycling%20Connections%20Photos?csf=1&amp;web=1&amp;e=4tXGN2</a>
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<b>Image Number</b>	<b>File Name</b>	<b>Date and Time (incl. Time zone and DST)</b>	<b>Description of Image</b>
1	IMG_0113.JPG	6/23/22 8:42 AM (MT)	Radiator pile
2	IMG_0114.JPG	6/23/22 8:42 AM (MT)	Radiator pile
3	IMG_0115.JPG	6/23/22 8:46 AM (MT)	Scrap pile with appliances
4	IMG_0116.JPG	6/23/22 8:46 AM (MT)	Refrigerator in scrap pile
5	IMG_0117.JPG	6/23/22 8:46 AM (MT)	Refrigerator in scrap pile
6	IMG_0118.JPG	6/23/22 8:47 AM (MT)	Back of refrigerator with cut line
7	IMG_0119.JPG	6/23/22 8:47 AM (MT)	Scrap pile with appliances
8	IMG_0120.JPG	6/23/22 8:48 AM (MT)	Refrigerators in scrap pile
9	IMG_0121.JPG	6/23/22 8:48 AM (MT)	Refrigerators in scrap pile
10	IMG_0122.JPG	6/23/22 8:48 AM (MT)	Refrigerators in scrap pile